

EXHIBIT C

Ahnhut, Adam

From: Deane, Michael
Sent: Monday, November 27, 2023 9:02 AM
To: Jon Ma; rak_cobblestone@raklaw.com
Cc: A&B Cobblestone; Dacus, Deron; Melissa Smith
Subject: RE: Cobblestone re 23-382 (Lead) Contentions Extension

Counsel,

We believe consolidation of the below Cobblestone cases against the carriers is appropriate. Consolidation is appropriate under Federal Rule of Civil Procedure 42(a) due to common questions of law and fact. Consolidation of all cases will help to preserve the parties' and Court's resources given the overlap in discovery, technology, parties, and Accused Products.

- *Cobblestone Wireless, LLC v. AT&T Mobility LLC et al.*, Civil Action No. 2:23-cv-00380 (E.D. Tex.);
- *Cobblestone Wireless, LLC v. T-Mobile USA, Inc.*, Civil Action No. 2:23-cv-00381 (E.D. Tex.); and
- *Cobblestone Wireless, LLC v. Cellco Partnership d/b/a Verizon Wireless*, Civil Action No. 2:23-cv-00382 (E.D. Tex.) (Lead case) **(collectively, -389, -381, and 382, Cobblestone 2.0 Carrier Cases)**
- *Cobblestone Wireless, LLC v. T-Mobile USA, et al.*, Civil Action No. 2:22-cv-00477 (E.D. Tex.);
- *Cobblestone Wireless, LLC v. Verizon Communications Inc., et al.*, Civil Action No. 2:22-cv-00478 (E.D. Tex.); and
- *Cobblestone Wireless, LLC v. AT&T Inc. et al.*, Civil Action No. 2:22-cv-00474 (E.D. Tex.). **(collectively, -477, -478, and 474, Cobblestone 1.0 Carrier Cases)**

Given the similarities between Cobblestone 1.0 Carrier Cases and the Cobblestone 2.0 Carrier Cases, Defendants intend to file a motion with the Court requesting that the Court consolidate all cases into the Cobblestone 2.0 Carrier Cases.

We have been trying to contact members of your team since September to discuss this proposal. Given the Cobblestone 2.0 cases are set for scheduling on December 4, please provide your position on this motion and, if you oppose, times you are available to meet and confer this week.

Thanks,

Michael C. Deane
Senior Associate
ALSTON & BIRD
1201 West Peachtree Street
Atlanta, GA 30309
+1 404 881 4943 (O)
Michael.Deane@alston.com

From: Jon Ma <jma@raklaw.com>
Sent: Thursday, November 16, 2023 5:29 PM
To: Deane, Michael <Michael.Deane@alston.com>
Cc: A&B Cobblestone <A&BCobblestone@alston.com>; Dacus, Deron <ddacus@dacusfirm.com>; Melissa Smith <melissa@gillamsmithlaw.com>; rak_cobblestone@raklaw.com
Subject: Re: Cobblestone re 23-382 (Lead) Contentions Extension

EXTERNAL SENDER – Proceed with caution

Thanks Michael. We agree not to use the extension as the basis to oppose any future motion to consolidate. Additionally, please provide your basis for consolidation in order for us to further evaluate your proposal.

Jon Ma
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor | Los Angeles, California 90025
Main +1 310 826 7474 | jma@raklaw.com

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On Nov 16, 2023, at 2:00 PM, Deane, Michael <Michael.Deane@alston.com> wrote:

Hi Jon – We believe these cases should be consolidated with the prior cases Cobblestone filed against the carriers. We will follow up separately on this issue with additional details next week. In the meantime, we agree to your two-week extension so long as you do not use our agreement as a basis to oppose any future motion to consolidate.

Thanks,

Michael C. Deane
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Michael.Deane@alston.com

From: Jon Ma <jma@raklaw.com>
Sent: Thursday, November 16, 2023 3:45 PM
To: A&B Cobblestone <A&BCobblestone@alston.com>; Dacus, Deron <ddacus@dacusfirm.com>; Melissa Smith <melissa@gillamsmithlaw.com>
Cc: rak_cobblestone@raklaw.com
Subject: Re: Cobblestone re 23-382 (Lead) Contentions Extension

EXTERNAL SENDER – Proceed with caution

Following-up on below.

Thanks,
Jon

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On Nov 13, 2023, at 10:23 AM, Jon Ma <jma@raklaw.com> wrote:

Counsel,

We request a 2-week extension for Plaintiff's infringement contentions to 12/4. We are amenable to the same extension for Defendants' invalidity contentions. Please let us know.

Thank you,
Jon

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